

**IN THE UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

In re

Chapter 9

CITY OF DETROIT, MICHIGAN,

Case No. 13-53846

Debtor.

Hon. Thomas J. Tucker

**STIPULATION RESOLVING HAAS & GOLDSTEIN, P.C.'S MOTION
FOR RECONSIDERATION OR CLARIFICATION OF AMENDED
OPINION REGARDING MOTIONS FILED BY THE CITY OF DETROIT,
DATED APRIL 19, 2016**

The City of Detroit ("City") and Haas & Goldstein, P.C. ("Haas"), stipulate and agree as follows:

1. On April 15, 2016, this Court entered its Order Regarding the City of Detroit's Motion for (I) Determination that the Goodman Acker and Haas & Goldstein Law Firms Have Violated the Plan of Adjustment by (A) Refusing to Honor an ADR Settlement and/or (B) Seeking Relief on a Pre-Petition Claim Beyond That Allowed by the Plan of Adjustment and (II) Order Enjoining Further Violations [Doc. No. 11091] ("Order").

2. On April 19, 2016, the Court issued an amended opinion regarding the Order. [Doc. No. 11098].

3. On May 3, 2016, Haas & Goldstein, P.C. filed its Motion for Reconsideration or Clarification of Amended Opinion Regarding Motions Filed by

the City of Detroit, Dated April 19, 2016 [Doc. No. 11142] (“Motion for Reconsideration”).

4. On May 5, 2016, this Court entered an order requiring the City to respond to the Motion for Reconsideration by no later than May 19, 2016. [Doc. No. 11144].

5. Subject to this Court’s approval, the parties have agreed to resolve the Motion for Reconsideration by removing paragraphs 2 and 3 from the Order and replacing them with

“Haas is ordered to dismiss its motion currently pending in the state court for penalty interest and attorney fees and is hereby enjoined from seeking those penalties in the action in which Haas represents Summit regarding care Summit provided to Ms. Sheila Williams (*Summit Med. Grp. (Sheila Williams) v. City of Detroit*, Wayne County Circuit Court No. 14-010025-NF, the “Summit(Williams) Action”). Haas is additionally enjoined from seeking state court relief regarding enforcement of any settlement in the Summit(Williams) Action, as this Court possesses exclusive jurisdiction in that regard. However, Haas and Summit are entitled to litigate the validity of Summit’s claim for no-fault benefits in the Summit(Williams) Action.”

6. Consequently, the parties respectfully request that the Court enter the proposed order attached as Exhibit 1.

<p>ATTORNEYS FOR THE CITY</p> <p>By: <u>/s/ Marc N. Swanson</u> Jonathan S. Green (P33140) Marc N. Swanson (P71149) MILLER, CANFIELD, PADDOCK AND STONE, P.L.C. 150 West Jefferson, Suite 2500 Detroit, Michigan 48226 Telephone: (313) 963-6420 Facsimile: (313) 496-7500 green@millercanfield.com swansonm@millercanfield.com</p> <p>-and-</p> <p>Charles N. Raimi (P29746) Deputy Corporation Counsel City of Detroit Law Department 2 Woodward Avenue, Suite 500 Coleman A. Young Municipal Center Detroit, Michigan 48226 Telephone: (313) 237-5037 Facsimile: (313) 224-5505 raimic@detroitmi.gov</p>	<p>ATTORNEYS FOR HAAS & GOLDSTEIN</p> <p>By: <u>/s/ Justin Haas</u> Justin Haas (P53153) HAAS & GOLDSTEIN, P.C. 31275 Northwestern Highway, Suite 225 Farmington Hills, MI 48334 Telephone: (248) 702-6550 jhaas@haasgoldstein.com</p>
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Dated: May 16, 2016

EXHIBIT 1

**IN THE UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

In re

Chapter 9

CITY OF DETROIT, MICHIGAN,

Case No. 13-53846

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Hon. Thomas J. Tucker

**ORDER GRANTING STIPULATION RESOLVING HAAS & GOLDSTEIN,
P.C.'S MOTION FOR RECONSIDERATION OR CLARIFICATION OF
AMENDED OPINION REGARDING MOTIONS FILED BY THE CITY OF
DETROIT, DATED APRIL 19, 2016**

Upon the Stipulation Resolving Haas & Goldstein, P.C.'s Motion for Reconsideration or Clarification of Amended Opinion Regarding Motions Filed by the City of Detroit, Dated April 19, 2016 (Dkt. No. [], "Stipulation"); and the Court being otherwise advised in the premises;

IT IS ORDERED THAT paragraphs 2 and 3 are removed from the Order Regarding the City of Detroit's Motion for (I) Determination that the Goodman Acker and Haas & Goldstein Law Firms Have Violated the Plan of Adjustment by (A) Refusing to Honor an ADR Settlement and/or (B) Seeking Relief on a Pre-Petition Claim Beyond That Allowed by the Plan of Adjustment and (II) Order Enjoining Further Violations [Doc. No. 11091] and replaced with: "Haas is ordered to dismiss its motion currently pending in the state court for penalty interest and attorney fees and is hereby enjoined from seeking those penalties in the action in

which Haas represents Summit regarding care Summit provided to Ms. Sheila Williams (*Summit Med. Grp. (Sheila Williams) v. City of Detroit*, Wayne County Circuit Court No. 14-010025-NF, the “Summit(Williams) Action”). Haas is additionally enjoined from seeking state court relief regarding enforcement of any settlement in the Summit(Williams) Action, as this Court possesses exclusive jurisdiction in that regard. However, Haas and Summit are entitled to litigate the validity of Summit’s claim for no-fault benefits in the Summit(Williams) Action.”